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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
ST. PAUL DIVISION

FRANKIE EDWARD ADAMS,
Plaintiff,

V.

CITY OF ST PAUL ET.AL.,
AND UNKNOWN AGENTS:
Defendants.

Case No. 22-cv-1902 ECT/LIB

DEMAND FOR JURY TRIAL

YES x NO

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER
42 U.S.C. § 1983

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved

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in this action or otherwise relating to your imprisonment in the last three years?

☐ Yes

☒ No

B. If you answer to (a) is "yes", describe each lawsuit in the space below.

1. Parties to the previous lawsuit: N/A

Plaintiffs: N/A

Defendants: N/A

2. Court (If federal court, name the district. If state court, name the state and county.):

N/A

3. Case Number:

N/A

4. Name of judge assigned to the case: N/A

5. Cause of action (Cite the statute under which you filed and write a brief statement of the case):

N/A

N/A

N/A

6. Disposition or final determination of the case (for example, dismissed or appealed).

N/A

7. Approximate date of filing the lawsuit: N/A

8. Approximate date of disposition or final determination of the lawsuit:

N/A

Attach a copy of the disposition or final determination of the lawsuit if it was filed in a court other than the U.S. District Court for the District of Minnesota.

If there was more than one lawsuit, describe the additional lawsuits on a separate sheet of paper answering the same questions in the same order as above in Question 1(b). Label this information as Question 1(b).

Check here if additional sheets of paper are attached. ☐

II. PRESENT PLACE OF CONFINEMENT

A. Is there a prisoner grievance procedure in the institution?

☐ Yes

N/A

☐ No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure?

☐ Yes

N/A

☐ No

C. If you answered "yes" to question II.B.:

1. What steps did you take:

N/A

2. What was the result?

N/A

Attach a copy of the decision or disposition received from the prisoner grievance procedure.

N/A

D. If you answered "no" to question II.B., explain why you did not present the facts relating to your complaint in a prisoner grievance procedure.

Because, no jail or prison system is involved in this incident discribed in the complaint.

III. PARTIES

List your name, prisoner number, address and telephone number. Do the same for any additional plaintiffs. Attach an additional sheet of paper, if necessary.

A. Name of Plaintiff: Frankie Adams

Prisoner Number

Address P.O. Box #2068, Inez, Kentucky 41224

Additional Plaintiffs: N/A

Provide each defendant's full name, official position, and place of employment. Attach additional sheets of paper, if necessary.

B. Name: City of St. Paul

Official Position: Municipality

Employer's Address: 15 Kellogg Blvd W., 310 W. City Hall
St Paul, MN. 55102

Additional Defendants: Unknown

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper as II.A. for Plaintiffs and II.B. for Defendants.

IV. STATEMENT OF THE CLAIM

1. Between January 2010 and 2013, plaintiff became a target of racial animus motivated attacks and harrassment by St. Paul Police Officials over their desire to coerce Mr. Adams cooperation against active Cripe Gang Members who was under investigation, which Mr. Adams refused to act as an informant, because he left that life, and was not about to be forced back in because Law Enforcement sought to make ir easier to achieve their purspose by indangering the plaintiff.

2. Between 2012 and 2013, the City of St Paul defendants realize they was on the lossing end of their Police Acts and omissions under the First and eighth Amendment violations decided to settle a previous lawsuit out of court.

3. Between 2015 and 2018., St. Paul Police had decided to elicit the aid of its Zonning Enforcement Sub-Department and Parking Enforcement Units to conduct several Fourth Amendment raids against the plaintiff's business property he had operated from for several years with lawful permits, and still issued Zoning Ticket violations each and every time they appeared with heavely armed cops to back their activities, using swat team tactics.

4. Between 2015 and 2018., plaintiff attempted to follow proper political protocal, and appeared before St Paul City Counsel Officials Town Hall Meetings to dispute these unwarranted.... incursions by Zoning and Parking Department employees, acting on the Police Department's behaft.

5. Between 2015 and 2018., City Councilman had several adjourments, and consulted with senior St. Paul Police who remained out of sight, on an ex parte communications, while Mr. Adams attempted to testify about these racial attacks, and prior settlements with the City over Law Enforment misfeasance.

6. Between 2015 and 2018., the City of St Paul revoked plaintiff's business permits, and ordered Mr. Adams to have all his commercial and personal property removed from his premises or loose them.

7. Between 2015 and 2018., the plaintiff filed objections over the fact he owned the property in question, had an business office, being remodeled, with vehicles on the lot, besides other things, in which City Councilmembers plained ignored records presented to them showing that their departments was fabricating its reports.

8. Between 2017 and 2018., the plaintiff was in the process of removing his commercial goods off his property, the City had no right to evict him from, when several police defendants unknown showed-up while plaintiff was in transit between places, with Zoning and Parking Officials who confiscated the following items:

- A. Snow Blower
- B. Lawn Mower
- C. Weed Whacker
- D. Rear Truck Axle

9. Between 2017 and 2018., plaintiff reappeared at his auto shop, and seen police marking his vehicles an orange color paint, and when Mr. Adams raised a protest, those unknown officers hiding their name tages, threaten plaintiff with arrest if he did not stop loitering and menacing City employees, leaving the area.

10. The next day after this incident cited above, plaintiff came back with the intent to remove his vehicles to an another location, however, when he appeared, the Postal mailbox

Mr Adams had purchased and installed with the United States Direct authorization was bulldozed down and taken while tow trucks removed all of his vehicles, that was both properly insured, licensed and not parked illegally, or in an unauthorized area, since it was on his property.

11. Between 2017 and 2018., the plaintiff was told by police officials, that if he did not leave the area he would in fact be charged with criminal trespass upon his own property, as well as other criminal violation they could infer over his protest about their unlawful activities.

CLAIMS FOR RELIEF

COUNT ONE:

VIOLATION OF FOURTH AND FOURTEENTH RIGHT TO BE FREE FROM UNREASONABLE SEARCH AND SEIZURES:

12. Plaintiff realleges each of the previous paragraphs as if fully set forth here that:

A. The policy, practice and custom of the City of St. Paul and its City Council issuing property seizures without any probable cause whether an actual as oppose to suppositions that an Business owner, acting within the interstate commerce, has committed or was about to commit an offense against the Laws of the State (or) Federal Government, let alone City policies, deprived plaintiff of his constitutional rights from unlawful incursions and seizures with out a compelling interest to intrude upon plaintiff's affiars.

COUNT TWO:

VIOLATION OF THE FOURTEENTH AMENDMENT DUE PROCESS
AND EQUAL PROTECTION CLAUSES OF THE CONSTITUTION
AND LAWS OF THE UNITED STATES:

13. Plaintiff realleges each of the previous paragraphs as if fully set forth here that:

A. The Defendant City of St Paul and those Unknown turn a blind eye to police blue wall of silence and racial biasness against black Citizens, who are not allowed to seek reformation back into society without an harrassment campaign being conducted upon a business owner due to Law Enforcement prejudices allowed to fester within its ranks and file employees introduced into such invidious acts and omission based upon a Public Sector Union involvement type indoctrinations, that deprive monorities peace and dignity within Laws of The United States.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to letter the paragraphs consecutively.

V. REQUEST FOR RELIEF:

A. Order the defendants to pay compensatory damages to the plaintiff in the amount of One Million Dollars from each person involved.

B. Order the defendants to pay punitive damages in the amount of One Million dollars each for the wilful violation of plaintiff's civil rights.

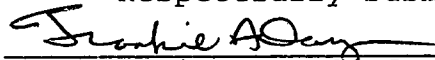
C. Order the defendants to pay any attorney fees, or court fees and other such expenses Mr. Adams has cost to bear.

D. Issue a decleration that the defendants violated his Fourth and Fourteenth Amendment rights for illegal search/seizure and privacy invasion, and displaying a disregard of their duties.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge, and belief. 28 U.S.C. §1746:

Respectfully Submitted

Dated: 7-26-22



Mr. Frankie Edward Adams, Plaintiff
Federal Registered Number #08011-041
United States Penitentiary Big Sandy
P.O. Box #2068
Inez, Kentucky 41224

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.